

# NORGAARD, O'BOYLE & HANNON

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**PLEASE REPLY TO  
ENGLEWOOD OFFICE**

August 15, 2024

## **VIA ECF**

Honorable John K. Sherwood  
United States Bankruptcy Court  
Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, NJ 07102

**Re: In re Anna Aslanian  
Ch. 13 Case No. 23-18894 (JKS)  
Initial Letter Response of Party-in-Interest Vatche Aslanian  
a/k/a Kevin Aslanian to Debtor's Motion to Sell Real Property  
Hearing: August 22, 2023 at 10:00 a.m.**

Dear Judge Sherwood:

This firm represents Vatche Aslanian a/k/a Kevin Aslanian, the Debtor's estranged husband and co-trustee for the Aslanian Family Trust (the "Trust") in the subject Chapter 13 bankruptcy proceeding. Please accept this Letter Response in lieu of a more formal Response by Mr. Aslanian to the Debtor's Motion For Authorization to Sell Debtor's Interest in 413 The Fenway River Edge, New Jersey Under § 363(b) (the "Motion") [Doc. No. 48] seeking an Order to approve a sale of real property located at 413 the Fenway, Borough of River Edge, New Jersey

07661 (the “Property”) to proposed buyer NJ North Development, LLC (the “Purchaser”) for \$612,000.00. As the co-trustee of the Trust, which is the owner of record of the Property, it is Mr. Aslanian’s position that the Debtor’s proposed sale of the Property as set forth in the Motion is inappropriate and that the Motion, as filed should be denied by the Court. However, the parties, through their respective counsel, agreed to briefly continue to discuss terms of a settlement which would allow a sale of the Property to proceed with a revised proposed Order. In the event that a satisfactory resolution cannot be reached, counsel shall e-file a Supplemental Response to the Motion.

Respectfully submitted,

Norgaard, O’Boyle & Hannon  
Counsel for Kevin Aslanian

By: /s/ Milica A. Fatovich, Esq.  
Milica A. Fatovich, Esq.